

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JAN KOPACZ AND CATHY KOPACZ

v.

DELAWARE RIVER & BAY AUTHORITY

and

CRAIG SWETT

CIVIL ACTION

NO. 04-911 & 04-1281

AMENDED OBJECTIONS¹ OF DEFENDANT,
DELAWARE RIVER AND BAY AUTHORITY, TO TRIAL DEPOSITIONS

WITNESS: Elisa Montross-Lopez, M.D.

<u>Page</u>	<u>Line</u>	<u>Objection</u>
35	21-24	Witness is admittedly not qualified.
36	1-24	Witness is admittedly not qualified.
37	1-18	Witness is admittedly not qualified.

WITNESS: Jeffrey Malumed, M.D.

<u>Page</u>	<u>Line</u>	<u>Objection</u>
34	21-24	Asked and answered; argumentative; calls for speculation; lack of foundation.
35	1-24	Asked and answered; argumentative; calls for speculation; lack of foundation.
49	20-24	Insurance, relevance.
50	1-24	Insurance, relevance.
61	5-24	Hearsay, unfair surprise.
62	1-8	Hearsay, unfair surprise.

¹Amended to correct typographical errors.

WITNESS: Mohammad Mehdi, M.D.

<u>Page</u>	<u>Line</u>	<u>Objection</u>
21	23-25	Asked and answered.
22	1-11	Asked and answered.
23	24-25	Asked and answered.
24	1-21	Asked and answered.
33	24-25	Asked and answered.
34	1-10	Asked and answered.
35	5-25	Calls for speculation.
36	1-7	Calls for speculation.
55	1-7	Counsel colloquy (Interruption of cross by plaintiff's counsel).
62	15-25	Lack of foundation; assumes facts not in evidence.
63	1-20	Lack of foundation; assumes facts not in evidence.

All other objections in the transcripts are waived. We withdraw our objections to the trial depositions of Marc Greenstein, Carol Swett and Jessica Swett.

Respectfully submitted,

Rosenthal, Monhait, Gross & Goddess, P.A.

/s/ Carmella P. Keener

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DATED: February 6, 2006

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CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2006, I electronically filed with the Clerk of Court AMENDED OBJECTIONS OF DEFENDANT, DELAWARE RIVER AND BAY AUTHORITY, TO TRIAL DEPOSITIONS using ECF which will send notification of such filing to the following:

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